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Comments Regarding Docket No. FAA-2002-12261; Notice No.02-09 - 4

There should be a distinction from Reduced Vertical Separation Minimum and Domestic Reduced Vertical Separation Minimum.

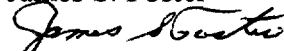
Appendix G to Part 91, Section 3. Paragraph (C), 2nd sentence for the new DRVSM, should read, each pilot has an adequate knowledge of Domestic Reduced Vertical Separation Minimum.

Many part 91 Jet aircraft will not be flying overseas and do fly only Domestically. Therefore to require the crews to have knowledge of overseas navigation procedures is not necessary.

The Letter of Authorization to operate in DRVSM airspace should be separated from the LOA to operate in RVSM airspace. DRVSM aircraft will not be flying in tracks, and will not be flying in Europe.

Altimeter Requirements- 91.411 Altimeter and Altitude Reporting Equipment Tests and inspections have all the necessary requirements to operate in DRVSM airspace. Aircraft operating domestically should not be required to have the expensive test by AIRINC to check DRVSM aircraft altitude. Center radar combined with the new transponders read aircraft altitude very accurately.

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